

# ***EXHIBIT 19***

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,      )  
et al.                                    )  
  )  
  )  
  )  
VS.                                        )  
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  )  
GREGORY W. ABBOTT, et al.        )  
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  )  
  )

CASE NO.  
5:21-cv-844-XR  
(LEAD CASE)

OCA-GREATER HOUSTON, et al.    )  
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  )  
VS.                                        )  
  )  
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  )  
JANE NELSON, et al.                )  
  )  
  )  
  )

CASE NO.  
1:21-cv-780-XR

HOUSTON AREA URBAN LEAGUE,    )  
et al.                                    )  
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  )  
VS.                                        )  
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GREGORY WAYNE ABBOTT, et al.    )  
  )  
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  )

CASE NO.  
5:21-cv-848-XR

LULAC TEXAS, et al.                )  
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VS.                                        )  
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JANE NELSON, et al.                )  
  )  
  )  
  )

CASE NO.  
1:21-cv-0786-XR

MIFAMILIA VOTA, et al.                   )(  
Plaintiffs                                 )  
  
VS.    )( CASE NO.  
  ) 5:21-cv-0920-XR  
GREG ABBOTT, et al.                    )  
Defendants                                 )

UNITED STATES OF AMERICA                    )  
                  Plaintiff                    )  
  )  
VS.    )  
  )  
THE STATE OF TEXAS, et al.                )  
                  Defendants                    )

CASE NO.  
5:21-cv-1085-XR

ORAL AND VIDEOTAPED DEPOSITION OF  
MARIA GOMEZ  
APRIL 25, 2023

ORAL AND VIDEOTAPED DEPOSITION OF MARIA GOMEZ,  
produced as a witness at the instance of the State  
Defendants, taken in the above-styled and numbered  
cause on APRIL 25, 2023, between the hours of  
10:07 a.m. and 12:17 p.m., reported stenographically by  
DONNA McCOWN, Certified Court Reporter No. 6625, in and  
for the State of Texas, at La Union Del Pueblo Entero,  
1601 US 83 Business, San Juan, Texas, pursuant to the  
Federal Rules of Civil Procedure and any provisions  
stated on the record or attached therein.

1 about, were there any documents that y'all reviewed?

2 A. No.

3 Q. Well, like I said, Maria, my name is Luis  
4 Suarez. So kind of how this goes is I'm going to ask  
5 you some questions, and the court reporter here will be  
6 taking them down. And I just need you to respond  
7 truthfully the best you -- the best way you can. Do  
8 you understand that?

9 A. Yes.

10 Q. How old are you, Ms. Gomez?

11 A. 74.

12 Q. And do you live in Harlingen?

13 A. No.

14 Q. Where do you live?

15 A. In Pharr.

16 Q. Is that about 20 minutes from here?

17 A. More or less.

18 Q. And how long have you lived in Pharr?

19 A. For many years.

20 Q. Were you born in Pharr?

21 A. Yes.

22 Q. And you -- do you currently work for LUPE?

23 A. No.

24 Q. Where do you currently work?

25 A. I am retired.

1 Q. Where did you work before you retired?

2 MS. SERNA URIBE: Objection, vague.

3 A. At LUPE.

4 Q. Let me take a step back. There will be times  
5 when your attorney will object. You can let her finish  
6 her objection and then still answer, unless she  
7 instructs you not to. Okay?

8 A. Okay.

9 Q. So you said before you retired you worked for  
10 LUPE; is that correct?

11 A. Yes.

12 Q. How long did you work for LUPE?

13 A. I don't remember how many years.

14 Q. Could you give an estimate?

15 A. More than ten.

16 Q. Did you work somewhere before that?

17 MS. SERNA URIBE: Objection, vague.

18 Q. You can answer.

19 A. What's the question?

20 Q. Did you work somewhere before you worked for  
21 LUPE?

22 A. Yes.

23 Q. And where did you work?

24 A. Union de Campesinos and in the field.

25 Q. What is Union de Campesinos?

1 A. I visit people at home, and I visit other  
2 people like me.

3 Q. And what do y'all generally do?

4 MS. SERNA URIBE: Objection, vague.

5 Q. You can answer.

6 A. Well, I take some people to the doctor. To  
7 others, I help them. I clean their rooms. To others,  
8 I try to talk to them. I -- I take food to share. I  
9 try to also to do the hygiene.

10 MS. SERNA URIBE: Would it be possible to  
11 have the interpreter also interpret my objections?

12 MR. SUAREZ: That's fine.

13 MS. SERNA URIBE: Thank you.

14 THE INTERPRETER: I'll do that.

15 Q. As -- as far as your volunteer work with LUPE,  
16 do you ever assist people -- or do you ever assist  
17 people with voting?

18 MS. SERNA URIBE: Objection, vague.

19 Q. You can answer.

20 A. I used to do it before, but I don't feel  
21 committed. I mean, I don't feel able to do it right  
22 now.

23 Q. When you say you used to do it before, when did  
24 you used to do it?

25 A. I believe it was before '21.

1 Q. What happened in '21 that changed your  
2 position?

3 A. I started here --

4 MS. SERNA URIBE: Objection -- sorry --  
5 vague; calls for speculation.

6 MR. SUAREZ: You can still translate what  
7 she said.

8 A. I started hearing that there was a change in  
9 the laws, and I didn't want to continue because I  
10 didn't want to make a mistake.

11 Q. You said that you heard there was a change in  
12 the law, correct?

13 MS. SERNA URIBE: Objection, vague and  
14 calls for speculation.

15 Q. You can answer.

16 A. Well, we didn't have to help the people anymore  
17 to vote. Well, it's not that we couldn't. They didn't  
18 want us to. I mean, us, that we were helping people to  
19 vote, we didn't have to do it anymore.

20 Q. Why didn't -- why didn't y'all have to do it  
21 anymore?

22 MS. SERNA URIBE: Objection, vague.

23 Q. You can answer.

24 A. I wasn't -- I wasn't feeling that okay to help  
25 people to vote because I didn't know how strong the law

1 was, how strong the law was as far as us helping. And  
2 when people would ask me, I will let them know that  
3 there were people inside that could help them. I was  
4 feeling impotent because I couldn't help them.

5 Q. You were -- you felt powerless, or you felt  
6 impotent to help?

7 A. Yes, because what I was hearing about the  
8 change in the law.

9 Q. Did LUPE ever instruct you not to -- to stop  
10 helping people vote?

11 MS. SERNA URIBE: Objection, vague;  
12 mischaracterizes the testimony.

13 Q. You can answer.

14 THE INTERPRETER: Could you repeat the  
15 question? The interpreter didn't interpret it.

16 Q. Did you ever -- did LUPE ever instruct you not  
17 to help people vote?

18 A. No.

19 Q. So you stopped helping people vote because you  
20 were worried about the law; is that correct?

21 MS. SERNA URIBE: Objection,  
22 mischaracterizes prior testimony; objection, vague.

23 Q. You can answer.

24 A. What's the question?

25 Q. You weren't instructed to stop helping people



1 vote, but you felt worried about the law and that's why  
2 you stopped helping people vote; is that correct?

3 MS. SERNA URIBE: Same objections.

4 A. I decided.

5 Q. Why -- how did you come to that decision?

6 MS. SERNA URIBE: Objection, vague; and  
7 objection, calls for speculation.

8 Q. You can answer.

9 A. What was the question I need to answer?

10 Q. How did you come to that decision to stop  
11 helping people vote?

12 MS. SERNA URIBE: Same objections.

13 Q. You can answer.

14 A. Because of the restrictions and then under oath  
15 and so many things that I didn't understand.

16 Q. Were you -- have you ever read the law -- or  
17 the SB 1 law?

18 A. I have heard of it.

19 Q. When you say you've heard of it, where have you  
20 heard of it?

21 MS. SERNA URIBE: Objection, vague.

22 Q. You can answer.

23 A. Well, on TV, on the radio, with people.

24 Q. When you went to trainings or meetings with  
25 LUPE, did they ever discuss the law?

1 previously helped vote that you were no longer going to  
2 assist them vote?

3 MS. SERNA URIBE: Objection, vague.

4 Q. You can answer.

5 A. Yes, they did ask me.

6 Q. And what was your response?

7 A. I told them that I was not trained anymore to  
8 be able to help them.

9 Q. Okay. Ms. Gomez, I want to narrow down what  
10 you were no longer trained for. You no longer received  
11 any training after SB 1 was passed. Is that your  
12 testimony?

13 MS. SERNA URIBE: Objection, vague.

14 Q. You can answer.

15 MS. SERNA URIBE: Objection,  
16 mischaracterizes the prior testimony.

17 A. I don't remember.

18 Q. You said you loved helping people or  
19 volunteering for LUPE; is that correct?

20 A. Yes.

21 Q. So deciding not to help people vote is a big  
22 decision; is that correct?

23 MS. SERNA URIBE: Objection, vague;  
24 objection, mischaracterizes prior testimony.

25 Q. You can answer.

1 Q. When you attended these meetings to familiarize  
2 yourself with SB 1, did you hear something that  
3 concerned you specifically about SB 1?

4 MS. SERNA URIBE: Same objections.

5 A. I don't remember.

6 Q. There had to be something that concerned you,  
7 correct?

8 MS. SERNA URIBE: Objection, vague;  
9 objection asked and answered; objection, argumentative.

10 Q. You can answer.

11 A. I was concerned with me not being able to help  
12 people to vote.

13 Q. When you say you were concerned you weren't  
14 able to help people vote, what was told to you or what  
15 was your belief of why you could no longer do that?

16 MS. SERNA URIBE: Objection, vague;  
17 objection, calls for speculation; and objection, it's a  
18 compound question.

19 Q. You can answer.

20 A. I need the question again.

21 Q. When you say that you were concerned regarding  
22 the bill, what was told to you or what was your  
23 understanding of SB 1 that prevented you or concerned  
24 you from helping people to vote?

25 MS. SERNA URIBE: Same objections.

1       A. I think that more than anything, it was the  
2       fear that that law would be hurting me for me helping  
3       people to vote.

4       Q. But what was -- what was the basis of that  
5       fear?

6               MS. SERNA URIBE: Objection, vague;  
7       objection, calls for speculation.

8       A. I believe to hear the negative things about  
9       this law.

10       Q. To your understanding, what were the negative  
11       things about the law?

12               MS. SERNA URIBE: Objection, vague; and  
13       objection, calls for speculation.

14       A. I don't remember right now, but yes, but I  
15       don't remember.

16       Q. Would you go help people to go vote today if  
17       you could?

18               MS. SERNA URIBE: Objection, vague;  
19       objection, calls for speculation.

20       Q. You can answer.

21       A. Can you ask me again?

22       Q. Would you go help people today to go vote if  
23       you could?

24               MS. SERNA URIBE: Same objections.

25       A. If I could, I would think so. Without fear,

1 A. We would be trained.

2 Q. And people that voted by mail-in ballots, to  
3 your understanding, did they still have to be  
4 registered to vote?

5 MS. SERNA URIBE: Objection, vague.

6 A. The problem here is that they stopped sending  
7 the ballots to vote over the mail. Not all of us  
8 received them.

9 Q. Was there any other problem aside -- aside from  
10 that that prevented you from helping people vote by  
11 mail?

12 MS. SERNA URIBE: Objection, vague.

13 A. Well, more than anything, I think it was my  
14 fear for something to affect me, something that would  
15 be in the law that will affect me.

16 Q. So you were -- were you worried about making a  
17 mistake?

18 MS. SERNA URIBE: Objection, vague.

19 A. Due to me not understanding the laws that well.

20 Q. In respect to mail-in voting or in general?

21 MS. SERNA URIBE: Objection, vague.

22 A. Well, in general.

23 Q. But you can't point to any specific part of  
24 SB 1 that worried you, correct?

25 MS. SERNA URIBE: Objection, vague;

1 objection, calls for speculation.

2 A. No.

3 Q. As far as the mail-in voting, are you aware of  
4 any instances where someone was not able to vote other  
5 than the -- their failure to register on time?

6 MS. SERNA URIBE: Objection, calls for  
7 speculation.

8 A. I don't remember.

9 Q. As a volunteer, prior to SB 1, did you help  
10 people vote by mail?

11 MS. SERNA URIBE: Objection, vague.

12 A. Yes.

13 Q. And it's your testimony that because of SB 1,  
14 you no longer can help people vote by mail?

15 A. I don't understand the law that well. That's  
16 why I'm trying not to help those people.

17 Q. Do you give them a number or somebody else that  
18 they can reach to seek assistance voting my mail?

19 MS. SERNA URIBE: Objection, vague.

20 A. Yes, right, there at the voting polls.

21 Q. If it's at the voting polls, then it wouldn't  
22 be voting by mail, correct?

23 MS. SERNA URIBE: Objection, vague;  
24 objection, calls for speculation.

25 A. It's that there was two different ways, one

1 A. Of course I did.

2 Q. And the problem with that oath is that other  
3 people didn't take the oath?

4 A. No. Well, they would be working there. They  
5 were the ones that were working at the polling onsite.

6 Q. As far as you yourself as a volunteer, did you  
7 have a problem with the oath?

8 MS. SERNA URIBE: Objection, vague.

9 A. No.

10 Q. But you have a problem with the new oath; is  
11 that correct?

12 A. No. It's not just -- it's not about the oath.  
13 It's about the restrictions. I don't have a problem  
14 with the oath. I just don't feel capable or -- to  
15 assist the people to vote.

16 Q. So you don't have a problem with the oath under  
17 SB 1; is that correct?

18 MS. SERNA URIBE: Objection, vague.

19 A. Well, I don't understand it that well nowadays.  
20 That's why I'm not -- I'm trying not to help people to  
21 vote.

22 Q. So you stopped assisting people to vote because  
23 you don't understand the oath. Is that fair to say?

24 MS. SERNA URIBE: Objection,  
25 mischaracterizes prior testimony.

1 A. Yes, because I don't feel at peace. I don't  
2 feel capable.

3 Q. What part of the oath makes you feel incapable  
4 of giving it -- sorry, of taking it?

5 MS. SERNA URIBE: Objection, vague.

6 A. Right now I don't know, but I don't want to  
7 risk on doing something that I feel that I'm not able  
8 to do.

9 Q. You felt that you're unable to take the oath?

10 A. Not the oath, but how the law is nowadays, what  
11 are the requirements, how many are the requirements.

12 Q. So correct me if I'm wrong. You didn't -- you  
13 don't have a problem with the oath. You have a problem  
14 with the restrictions around voting assistance; is that  
15 correct?

16 A. Yes, the restrictions. Then also restrictions  
17 that I don't understand that well, and that I don't  
18 want those problems for me.

19 Q. Can you identify what those alleged  
20 restrictions are?

21 MS. SERNA URIBE: Objection, vague.

22 A. Well, I don't know, but they're written there,  
23 or I have heard about them, that we cannot be -- we're  
24 not able to help the people to vote.

25 Q. You say you've heard about the restrictions?



1 A. Yes, I have heard about them, and that's why I  
2 will be abstaining myself from having that problem.

3 Q. What restrictions did you hear about?

4 A. Especially the one that we have heard about the  
5 most is that we're not able to help people to vote,  
6 especially us as volunteers.

7 Q. You were told that you can no longer volunteer?

8 MS. SERNA URIBE: Objection,  
9 mischaracterizes the testimony.

10 A. I don't believe so. I don't think they have  
11 told me that I cannot be a volunteer, but I can't do it  
12 because I don't feel, like, able to do it. I don't  
13 feel free like I used to before. I feel like my hands  
14 are tied.

15 Q. Why do you feel like your hands are tied?

16 A. Because what you hear about the law, that we're  
17 not able to help people to vote.

18 Q. That brings me back to the question of whether  
19 you were ever told or ever heard of an instance where  
20 you couldn't help people vote.

21 MS. SERNA URIBE: Objection, vague.

22 A. After '21, I haven't tried to go with them to  
23 the voting poll inside to help them vote.

24 Q. So you haven't tried to assist people to vote  
25 in the last election?

1 A. No.

2 Q. And that's because of your fear of being an  
3 assister?

4 A. Yes.

5 Q. Even though you can't point to any specific  
6 part of SB 1 that you're afraid of?

7 A. I don't know.

8 Q. So you -- you didn't try to help people vote in  
9 the last election?

10 A. To go inside with them, no.

11 Q. Do you know of other people that were voting  
12 assisters in the last election?

13 MS. SERNA URIBE: Objection, vague;  
14 objection, calls for speculation.

15 A. I don't remember.

16 Q. Do you have a lot of friends in LUPE that are  
17 volunteers?

18 A. Some.

19 Q. And you don't know any of them that volunteer  
20 to assist, help people vote?

21 MS. SERNA URIBE: Objection, calls for  
22 speculation.

23 A. I don't know.

24 Q. Were you at the polling station last election?

25 MS. SERNA URIBE: Objection, vague.

1 isn't correct, I think -- or complete, I should say.  
2 She testified that she also feared the law. I just  
3 want to make sure that that's in the record, the  
4 complete reason that she said she feared the law.

5 THE INTERPRETER: Well, I don't have  
6 the -- can you read my --

7 THE COURT REPORTER: Not in Spanish, I  
8 can't.

9 THE INTERPRETER: No. The interpretation.  
10 (Requested portion was read back.)

11 THE INTERPRETER: The interpreter stands  
12 corrected. The witness used the word "fear of not  
13 understanding the law."

14 Q. So, Ms. Gomez, I understand your fear and your  
15 worry. But my specific question is whether you  
16 understand or have knowledge or facts regarding how  
17 SB 1 has impacted voters who need assistance voting.

18 MS. SERNA URIBE: Objection, compound  
19 question, and it's vague, and it calls for speculation.

20 A. I think that the trust of the community is what  
21 has been lost because of the fear of going and not  
22 finding anybody to help them with voting.

23 Q. What's your basis for that knowledge?

24 A. The fear exists there. They used to look  
25 out -- look for us before, because we were one

1 community with them. And now, well, they look for me  
2 at least, but I don't feel able to help them.

3 Q. But you testified as to their fear and the  
4 effects SB 1 has on them. I'm specifically talking  
5 about what's your knowledge as to those effects.

6 MS. SERNA URIBE: Objection, vague;  
7 objection, calls for speculation; objection,  
8 mischaracterizes prior testimony.

9 A. The community effect or the law?

10 Q. I'm talking about the effects on voters who  
11 need assistance voting by mail.

12 MS. SERNA URIBE: Same objections.

13 A. I don't know.

14 Q. So your knowledge of the effects on SB 1 and  
15 the voters is speculation, kind of your own thoughts,  
16 derived from nothing else?

17 MS. SERNA URIBE: Objection,  
18 mischaracterizes prior testimony.

19 A. It's that people are different, so I don't  
20 know.

21 Q. Can you give me an example of one person that  
22 the effects of -- strike that.

23 Can you give me an example of what one  
24 person has said about how SB 1 affects them?

25 MS. SERNA URIBE: Objection, vague; and

1 Do you know if they ever requested a  
2 reasonable accommodation to vote by mail?

3 MS. SERNA URIBE: Objection, calls for  
4 speculation.

5 A. I don't remember.

6 MR. SUAREZ: Pass the witness.

7 MS. SERNA URIBE: I don't have any  
8 questions.

9 THE COURT REPORTER: Does anybody on Zoom  
10 have any questions?

11 I take it that nobody does. Does anybody  
12 on Zoom need a copy of the transcript?

13 MS. MENENDEZ: MALDEF will need a copy of  
14 the transcript. Samantha, the attorney who is there on  
15 behalf of MALDEF, will request one. Thank you.

16 MR. SUAREZ: We have a standing order.

17 (Deposition concluded)  
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